# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA **GREENVILLE DIVISION**

UNITED STATES OF AMERICA

V.

CR. NO .: 10: 22 CR 10/2

18 U.S.C. § 2261(a)(2) 18 U.S.C. § 2261(b)(1)

18 U.S.C. § 1111

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 924(j)(1)

18 U.S.C. § 1519

18 U.S.C. § 844(h)

LAWRENCE JOSEPH FLORENTINE a/k/a "LARRY"

**INDICTMENT** 

# COUNT 1

(Interstate Domestic Violence Resulting in Death)

#### THE GRAND JURY CHARGES:

That between on or about June 9, 2020 and June 11, 2020, in the District of South Carolina and elsewhere, the Defendant, LAWRENCE JOSEPH FLORENTINE, a/k/a, "LARRY", did knowingly and unlawfully cause his spouse and intimate partner, N.Z.F., to travel in interstate commerce by force, coercion, duress and fraud, and in the course of and to facilitate such conduct and travel, did commit a crime of violence, namely murder, as defined in Title 18, United States Code, Section 1111, which resulted in the death of N.Z.F.;

All in violation of Title 18, United States Code, Sections 2261(a)(2) and 2261(b)(1).

## COUNT 2

(Use of a Firearm to Cause Death During a Crime of Violence)

## THE GRAND JURY FURTHER CHARGES:

That on or about June 9, 2020, in the District of South Carolina and elsewhere, the Defendant, LAWRENCE JOSEPH FLORENTINE, a/k/a, "LARRY", knowingly did use and carry a firearm during and in relation to a crime of violence, as charged in Count 1 of this Indictment, which is prosecutable in a court of the United States, and did cause the death of a person through the use of a firearm, in such a manner to constitute murder, as defined in Title 18, United States Code, Section 1111, in that LAWRENCE JOSEPH FLORENTINE, with malice aforethought, did unlawfully kill N.Z.F., by shooting her with a firearm;

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(j)(1).

## COUNT 3

(Obstruction of Justice)

#### THE GRAND JURY FURTHER CHARGES:

That between on or about June 9, 2020 and June 22, 2020, in the District of South Carolina and elsewhere, the Defendant, LAWRENCE JOSEPH FLORENTINE, a/k/a, "LARRY", did knowingly alter, destroy, mutilate and conceal a record, document and tangible object, including, but not limited to electronic communications, and other electronically stored information, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, that is, a possible violation of Title 18, United States Code, Section 2261(a), a matter the defendant contemplated was within the jurisdiction of the Federal Bureau of Investigation, and in relation to and in contemplation of such matter.

All in violation of Title 18, United States Code, Section 1519.

## **COUNT 4**

(Use of Fire During the Commission of a Felony)

## THE GRAND JURY FURTHER CHARGES:

That on or about June 11, 2020, in the District of South Carolina and elsewhere, the Defendant, LAWRENCE JOSEPH FLORENTINE, a/k/a, "LARRY", did knowingly use fire in the commission of a felony, namely, interstate domestic violence resulting in death, as charged in Count 1, in violation of Title 18, United States Code, Section 2261(a), which is prosecutable in a court of the United States;

All in violation of Title 18, United States Code, Section 844(h).

A True Bill

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